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Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

GEN Docket No. 90-314
ET Docket No. 92-100

COMMENTS OF AMERITECH
ON INDUSTRY PROPOSALS
FOR UNLICENSED PCS 2GHZ TRANSITION

I. THE UTAM PROPOSAL'S "CLEAR SPECTRUM" REQUIREMENT
APPLIES TO ALL PCS DEVICES

As a threshold matter, Ameritech generally agrees with the UTAM proposal's foundation assumptions that (1) "coexistence between unlicensed PCS and fixed microwave systems is only possible for limited types of PCS devices -- those 'non-nomadic' devices utilizing a fixed infrastructure", and (2) "ultimately, there is a requirement for clear spectrum for the viable deployment of unlicensed PCS"¹. It is important to understand, however, that these two assumptions apply to both "nomadic" and "non-nomadic" devices.

A previously-filed Ameritech study demonstrated that, as a practical matter, spectrum sharing between PCS and fixed microwave systems represents an interim solution for specific interference situations which may arise during the rollout of PCS.² On a technical basis, this overall conclusion applies

¹UTAM Proposal, p. 6.

²ET Docket 92-9, Comments of Ameritech (January 13, 1993)

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equally to both classes of devices as described in the proposal. Sharing is problematic as a long-term solution of general applicability.

In addition, devices which UTAM would categorize as "non-nomadic" are.

III. THE "FRAME PERIOD" RECOMMENDATION IN WINFORUM'S PROPOSAL MAY CONSTRAIN THE SERVING TECHNOLOGY FOR PCS

The objectives of WINForum's suggested spectrum etiquette are commendable. There is a clear need to support diverse PCS applications within the same spectrum on a fair basis, and to provide for technical compatibility across platforms and services. WINForum's effort clearly took considerable resources, and deserves recognition and support. The approach chosen, however, may go too far.

To handle the complex interference issues presented by the proposal, it is plain that specifications for maximum bandwidth and power are needed. WINForum's approach is perfectly appropriate in these aspects.

If, on the other hand, a spectrum etiquette dictates parameters which drive experimentation to a specific technology, it can constrain, rather than foster technical advance by pre-identifying a preferred design or format. By specifying frame periods³, the WINForum proposal appears to have this effect.

IV. ANY STANDARDS EFFORT UNDER EITHER PROPOSAL SHOULD BE CLEARLY LIMITED TO UNLICENSED DEVICES

The proposals of UTAM and WINForum are both intended to foster the deployment of unlicensed PCS applications.⁴ Obviously, different interests will arise in considering the proper treatment of licensed and unlicensed PCS operations. The solutions chosen will necessarily depend on the technologies, economics, specific spectrum characteristics and other variables involved. Thus, as a general observation, the rules which the Commission may adopt in this

³WINForum Proposal, p. 6 (sections 4.1 - 4.2).

⁴UTAM Proposal, p. iii - iv; WINForum Proposal, p. 1.

particular matter should be limited in reach to unlicensed applications. This tight focus will serve the industry best at this early point in its development.

Respectfully submitted,

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